

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
FORT WORTH DIVISION**

**DEDRA MILLER,**

*Plaintiff,*

**vs.**

**CIVIL ACTION NO. 4:22-CV-00240-O**

**LIBERTY MUTUAL INSURANCE  
COMPANY,**

*Defendant.*

**PLAINTIFF'S DESIGNATION OF EXPERT WITNESSES**

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To: Defendant, **Liberty Mutual Insurance Company**, by and through its attorney of record Mark Tillman, Tillman Batchelor, LLP, 5605 N. MacArthur Blvd., Suite 560, Irving, Texas 75038.

Pursuant to Rule 26(a)(2) of the Federal Rules of Civil Procedure and the Scheduling Order dated May 2, 2022 (Doc. 8), Plaintiff, Dedra Miller, in the above-styled and numbered cause, submits this, her Designation of Expert Witnesses.

Plaintiff hereby designates the following experts who may be called to testify at trial:

**I. LOSS EXPERT**

**1. Michael Ogden, CGC, HCI, IICRC, CDDC, CDDR, PA**

All Disaster Claims, Inc.  
3235 Pawnee Pride  
San Antonio, Texas 78261  
Phone: (210) 300-4404

Mr. Michael Ogden, general contractor and licensed public adjuster for the State of Texas, is a retained expert. Mr. Ogden will testify to his factual and/or expert knowledge of the extent, nature, and causation of the damages to the Plaintiffs' property. His opinions will be based on his own inspection of the subject property, photographs of the property, his review of documents and materials, and his education, training, and experience as a general contractor and public adjuster. Mr. Ogden has factual and/or expert knowledge as to the proper means, method

and costs of repairing, replacing or correcting the damages caused to Plaintiffs' property as well as general commercial construction practices and procedures and cost estimation. Mr. Ogden will also testify to the particulars of the adjusting process and will testify for Plaintiffs that his estimate is valid and proper and should be paid by Defendant. A copy of Mr. Ogden's report is attached hereto as Exhibit "A" and his current curriculum vitae is attached hereto as Exhibit "B". Mr. Ogden's testimony history is attached as Exhibit "C" and invoice attached as Exhibit "D".

## **II. ATTORNEYS FEES EXPERT**

### **2. Shaun Hodge**

Hodge Law Firm, PLLC  
1301 Market Street  
Galveston, Texas 77550  
Phone: (409) 762-5000

Mr. Shaun Hodge is an attorney licensed to practice in the State of Texas, and he will testify regarding the reasonable and necessary attorney's fees and expenses and time expended in handling and prosecuting this case. Mr. Hodge will testify as to the nature and extent of the attorney's services performed in this case and as to the nature and degree of skill and knowledge required to render the legal services. Mr. Hodge will also testify as to the reasonableness of the hourly rate charged for legal services and as to the reasonable hourly rate charged by other attorneys in the area for same or similar work. Mr. Hodge will also testify as to his credentials, resume and experience in the legal profession and his experience in handling similar legal matters and issues. A copy of Mr. Hodge's current curriculum vitae is attached hereto as Exhibit "E".

Plaintiff, Dedra Miller, reserves the right to supplement and/or amend these responses in accordance with the Federal Rules of Civil Procedure and/or Scheduling Order entered in this case. Plaintiff further reserves the right to withdraw the designation of any expert witness and to affirm that such previously designated expert will not be called as an expert witness at trial. Plaintiff also reserves the right to cross examine, elicit testimony and opinions, and/or call as a witness, live or by deposition, any expert witnesses designated by the Defendant. Plaintiff does not affirm or attest to the qualifications of such experts to render any particular opinion or the accuracy or veracity

of any opinion expressed by Defendant's expert witnesses. Plaintiff reserves the right to seek to exclude any such experts designated by Defendant from testifying at trial and/or the right to object to the proffer of any opinion by such experts designated by Defendant. Finally, Plaintiff reserves the right to designate and to call expert witnesses to provide rebuttal testimony, the exact nature of which cannot currently be anticipated. Plaintiff will supplement in accordance with the Federal Rules of Civil Procedure.

Respectfully submitted,

/s/ Racchel D. Cabrera

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**ATTORNEYS FOR PLAINTIFF**

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing has been served in compliance with the Federal Rules of Civil Procedure on the 22nd day of August 2022, to:

Mark D. Tillman  
State Bar No. 00794742  
**TILLMAN BATCHELOR LLP**  
5605 N. MacArthur Blvd., Suite 560  
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E-mail: [mark.tillman@tb-llp.com](mailto:mark.tillman@tb-llp.com)  
**ATTORNEYS FOR DEFENDANT**

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*/s/ Racchel D. Cabrera*

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Rachel D. Cabrera